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Sent via email to: [vcchristiansen@fs.fed.us](mailto:vcchristiansen@fs.fed.us) and via U.S Certified Mail

October 5, 2018

Victoria Christiansen  
Interim Chief,  
US Forest Service  
Department of Agriculture  
1400 Independence Avenue, SW  
Washington, DC 20250

**RE: Request for a 60-day extension of the Public Comment Periods for the ANPRMs Revising 36 CFR 228 Parts A and B: Docket Numbers FS-2018-0052 and FS-2018-0053.**

Dear Ms. Christiansen,

Trout Unlimited is writing to request a 60-day extension of the public comment period for the recently published Advance Notice of Proposed Rulemaking (ANPRM) on changes to the US Forest Service (USFS) regulations at 36 CFR 228 Subpart A (Locatable Minerals) and Subpart E (Oil and Gas Resources). We believe the current 30-day public comment period for both ANPRM opportunities is far too short for the public to make considerate, thoughtful and informed comments on this important and critical regulatory process, which has not been significantly updated in 44 years.

Trout Unlimited is the largest coldwater conservation organization in North American with more than 300,000 members and supporters dedicated to conserving, protecting and restoring trout and salmon fisheries and their watersheds. We have vested interests in maintaining healthy ecosystems and watersheds across our national forests and in 2017 committed 734,824 volunteer hours working on various projects with numerous partners, including the USFS, across the nation. Trout Unlimited's policy is to support responsible energy development in a way that meets the needs of people while eliminating, minimizing or mitigating the impacts to coldwater fisheries and other wildlife resources important to our members and the public. The rulemaking process will directly impact how we approach our work on national forests.

Trout Unlimited supports the update efforts and improving permitting processes for locatable minerals and oil and gas resources, but these kinds of changes must include strong coordination with both the public and cooperating agencies; this is something that cannot be rushed. We have extensive experience working in leasing and development of energy projects on USFS and BLM lands and would like to express our concerns about how fast this public process is occurring. Updating outdated regulations and enhancing a balanced and cooperative approach to the leasing decision process is long overdue. However, as it is apparent in both Notices of Intent there are considerable legal, technical and environmental issues to consider as the USFS moves toward better regulatory resource reviews

and approvals. We believe 30 days will not allow the necessary time for the public and cooperating agencies to provide adequate review and comments.

Rulemaking that involves the future irrevocable commitment of our nations national forests is serious business. We respectfully request that the USFS extend the time for public comment periods so that those affected by these changes have an adequate opportunity to review and provide meaningful, constructive input on the proposed rulemakings.

Sincerely,

A handwritten signature in black ink, appearing to read 'Corey Fisher', written in a cursive style.

Corey Fisher  
Public Land Policy Director  
Trout Unlimited  
312 N. Higgins, Suite 200,  
Missoula, MT 59802  
[Corey.fisher@tu.org](mailto:Corey.fisher@tu.org)  
406-926-1497

Cc: Ms. Cheryl Nabahe, Minerals and Geology Management, USFS, Washington D.C.  
Ms. Sherri Thompson, USFS, Lakewood, CO